

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JUDICIAL WATCH, INC., and)
TRUE THE VOTE,)
)
Plaintiffs,) Case No. 1:12-cv-800-WTL-TAB
)
)
v.)
)
)
J. BRADLEY KING, TRENT DECKARD,)
and CONNIE LAWSON, in their official)
capacities,)
)
Defendants.)
)
_____)

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs Judicial Watch and True the Vote respectfully move the Court for summary judgment pursuant to Fed. R. Civ. P. 56 and S.D. Ind. Local Rule 56-1.

As shown in Plaintiffs' Brief and Statement of Material Facts Not in Dispute filed simultaneously herewith, Defendants have violated Section 8 of the National Voter Registration Act. 42 U.S.C. § 1973gg-6. Plaintiffs are therefore entitled to judgment as a matter of law on all counts of their Complaint.

Accordingly, Plaintiffs respectfully request that the Court enter an Order:

- Granting summary judgment for Plaintiffs on all claims;
- Awarding declaratory and injunctive relief to Plaintiffs;
- Awarding any other relief that the Court deems just and proper.

Dated: October 11, 2013

Respectfully submitted,

J. Christian Adams
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ *Chris Fedeli*

Chris Fedeli